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February 3, 2020

### Via ECF

Hon. Madeline Cox Arleo, U.S.D.J. U.S. District Court Martin Luther King, Jr. Federal Bldg. and Courthouse 50 Walnut St. Newark, NJ 07102

Re: Discovery Global Citizens Master Fund, Ltd., et al. v. Perrigo Co., plc, et al., Civil Action No. 2:19-cv-21502

Dear Judge Arleo:

This firm, together with Fried, Frank, Harris, Shriver & Jacobson LLP, represents defendant Perrigo Company plc ("Perrigo") in each of the 16 actions referenced on the attached list, including the above-referenced action. These actions are a class action (*Roofer's Pension Fund v. Papa, et al.*), 14 individual actions, and a derivative action (*Ryan R. Krueger v. Bradley A. Alford, et al.*).

The cases are all assigned to, and being handled by, your Honor and Magistrate Judge Wettre with the exception of the above-referenced recently filed individual action -- Discovery Global Citizens Master Fund, Ltd. et al. v. Perrigo Co. plc, et al., Civil Action No. 2:19-cv-21502 ("Discovery Global"). The plaintiffs in Discovery Global referenced the class action, Roofer's Pension Fund v. Papa, et al., Civil Action No. 16-cv-2805, as a related case on its Civil Cover Sheet. Accordingly, that case, which was filed on December 18, 2019, was also assigned to your Honor, but rather than being assigned to Magistrate Judge Wettre, has been assigned to Magistrate Judge Kiel at the Magistrate Judge level. The most recent case filed, another individual action, York Capital Management, L.P., et al v. Perrigo Co, plc, et al, Civil Action No. 2:19-cv-21732, was filed on December 20, 2019, two days after Discovery Global was filed, and was assigned to your Honor and Magistrate Judge Wettre.

We respectfully request that Magistrate Judge Wettre be assigned to be the Magistrate Judge on *Discovery Global* as she has been assigned to be the Magistrate Judge on the other

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cases. Case management and discovery in the class action and individual actions are being coordinated by Judge Wettre and the parties. We respectfully submit that it is appropriate for Magistrate Judge Wettre to continue doing so for ease of administration, coordination and consistency.

Thank you for your time and consideration.

Respectfully yours,

Alan S. Naar

ASN:cd Enclosure

cc: All counsel of record (via email)



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### **Class Action**

Roofer's Pension Fund v. Papa, et al., No. 2:16-cv-2805 (MCA)(LDW)

### **Individual Actions**

1121-MCA-LDW

Carmignac Gestion, S.A. v. Perrigo Company plc, et al., No. 2:17-cv-10467-MCA-LDW

First Manhattan Co. v. Perrigo Company plc, et al., No. 2:18-cv-2291-MCA-LDW

Harel Insurance Company, Ltd., et al. v. Perrigo Company plc, et al., 2:18-cv-2074-MCA-LDW

Mason Capital L.P., et al. v. Perrigo Co. plc, et al., No. 2:18-cv-1119-MCA-LDW

Pentwater Equity Opportunities Master Fund Ltd., et al. v. Perrigo Co. plc, et al., No. 2:18-cv-

TIAA-CREF Investment Management, LLC, et al. v. Perrigo Company plc, et al., No. 2:18-cv-8175-MCA-LDW

Nationwide Mutual Funds, et al. v. Perrigo Company plc, et al., No. 2:18-cv-15382-MCA-LDW WCM Alternatives: Event-Driven Fund, et al. v. Perrigo Co., plc, et al., No. 2:18-cv-16204-MCA-LDW

Hudson Bay Master Fund Ltd., et al. v. Perrigo Co., plc, et al., No. 2:18-cv-16206-MCA-LDW Schwab Capital Trust, et al. v. Perrigo Co. plc, et al., No. 2:19-cv-3973-MCA-LDW Oz Master Fund, Ltd., et al. v. Perrigo Co. plc, et al., No. 2:19-cv-4900-MCA-LDW Aberdeen Canada Funds -- Global Equity Fund, et al. v. Perrigo Co. plc, et al., No. 2:19-cv-6560-MCA-LDW

Discovery Global Citizens Master Fund, Ltd., et al. v. Perrigo Co., plc, No. 2:19-cv-21502

York Capital Management, L.P., et al. v. Perrigo Co., plc, et al., No. 2:19-cv-21732

#### **Derivative Action**

Ryan R. Krueger, derivatively on behalf of Nominal Defendant Perrigo Company plc v. Bradley A. Alford, et al., No. 2:19-cv-18652